



**VERMONT SECRETARY OF STATE**

**Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: [www.sec.state.vt.us](http://www.sec.state.vt.us)

**1. Acknowledgement Information.**

- a. **Name:** Sue Temple
- b. **Acknowledgement Address:** 250 East Broad Street, 21st Floor, Columbus, OH, 43215, USA
- c. **Email Address:** Sue.Temple@CBC-Companies.com
- d. **Phone No:** (614) 493-5714

**2. Data Broker Information.**

- a. **Name:** FD Holdings, LLC dba Factual Data
- b. **Primary Physical Address:** 5100 Hahns Peak Drive, Loveland, CO, 80538, USA
- c. **Primary Email Address:** Legal@CBC-Companies.com
- d. **Primary Internet Address (URL):** <https://www.factualdata.com/>

**3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☐ Yes ☒ No**

*If so:*

- a. **What was the method for requesting an opt-out?**
- b. **If the opt-out applied to only certain activities or sales, which ones?**
- c. **Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?**

**4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:**

Sale of consumer reports under the Fair Credit Reporting Act and identification information for uses permitted under the Gramm-Leach-Bliley Act.

**5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:**

Factual Data has implemented a purchaser credentialing process to ensure that purchasers are legitimate businesses that have a purpose permitted by law to access and use the information.

**6. The number of security breaches that the data broker experienced during the prior year: 0 .**

**Total number of consumers affected by the breaches: 0 .**



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

Purchasers of Factual Data products are lenders who require borrowers to be the age of majority to enter contracts. However, if a request to access a credit report on a minor is mistakenly attempted, credit information is not returned.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

None.

**9. Certification of Annual Registration.**

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Amy Hulthen  
PRINTED NAME

Amy Hulthen  
SIGNATURE

01/31/2019  
DATE